## VILARIÑO & ASSOCIATES LLC

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Attorney for Edgewell Personal Care Puerto Rico, Inc.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Bankruptcy No.: 18-23538(RDD)
Chapter 11
(Jointly Administered)
(Jointry Turimistered)

## MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR EDGEWELL PERSONAL CARE PUERTO RICO, INC.

**PLEASE TAKE NOTICE** that the undersigned, Mr. Javier Vilariño, appeared as *pro hac* vice counsel for Edgewell Personal Care Puerto Rico, Inc. ("Edgewell") in the captioned case. The undersigned hereby requests leave to withdraw as counsel for Edgewell Personal Care of Puerto Rico, Inc. and requests that the Clerk of the Court and all parties in interest remove the undersigned from all service lists.

**PLEASE TAKE FURTHER NOTICE** that, in compliance with Local Civil Rule 1.4, the undersigned certifies irreconcilable differences in the attorney-client relationship caused the

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Sears Holdings Publishing Company, LLC (5554); Sears STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816); The location of the Debtors' corporate headquarters is 3333 Beverly RoNUad, Hoffman Estates, Illinois

withdrawal; circumstances that have rendered the representation unreasonable difficult for the

undersigned to carry out the duties upon employment. Therefore, the undersigned has been forced

to resign effective immediately. At this moment, the undersigned has not asserted a retaining or

charging liens against Edgewell.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests that all

notifications be sent directly to Edgewell to the following address:

EDGEWELL PERSONAL CARE PUERTO RICO INC.

**PO BOX 70317** 

SAN JUAN, PR 00936

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests this

Honorable Court to afford Edgewell a period of thirty days to retain and announce new counsel.

WHEREFORE, the undersigned respectfully requests from this Honorable Court to grant

leave for the undersigned to withdraw as counsel for Edgewell; and that the Court affords Edgewell

a period of thirty days to retain and announce new counsel.

RESPECTFULLY SUBMITTED.

**DATED**: May 11, 2020

**CERTIFICATE OF SERVICE** 

I HEREBY CERTIFY THAT ON THIS SAME DATE, I ELECTRONICALLY FILED THE FOREGOING WITH THE CLERK OF THE COURT USING THE CM/ECF SYSTEM WHICH WILL SEND NOTIFICATION OF SUCH FILING TO ALL REGISTERED CM/ECF PA RTICIPANTS. ALSO, I CERTIFY THAT NOTICE OF THIS MOTION SHALL BE SERVED UPON EDGEWELL IN COMPLIANCE WITH

LOCAL CIVIL RULE 1.4.

/s/ Javier Vilariño

JAVIER VILARIÑO

USDC-PR NO. 223503

(Admitted Pro Hac Vice)

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